

EXHIBIT Q

Law Offices of
**Kenneth
Hiller** PLLC

Main Office: 6000 North Bailey Avenue, Suite 1A, Amherst, New York 14226
Telephone: (716) 564-3288 Facsimile: (716) 332-1884
Toll Free Number: (877) 236-7366
www.kennethhiller.com

RECEIVED

OCT 27 2016

CONNORS LLP

October 25, 2016

Via Fax and Mail

Connors LLP
1000 Liberty Building
Buffalo, NY 14202
Fax: 716-852-5649

Re: Wagner v. Chiari & Ilecki, LLP

Dear Messrs. Connors and Woodard:

On October 18, 2016, your firm served my associate, Seth Andrews, with a notice to take his deposition. That same day, I sent you an email requesting that your firm immediately withdraw as counsel given the obvious conflict of interest that has emerged in this case.

It was surprising enough that your firm, which I have the greatest respect for, would resort to the type of gamesmanship that service of the deposition notice represents. But it is even more surprising that upon being presented with a claim that your firm is engaged in a serious conflict of interest, that there would be no response.

Out of respect for your firm, and in the hope that we can avoid motion practice, I am making one final attempt to solicit a response to our demand that you withdraw as counsel. If I do not hear from you by Friday, October 28, 2016, I will file a motion to disqualify your firm from this case.

Very truly yours,



Kenneth Hiller

Encl. 10/18/2016 email

From: Ken Hiller [<mailto:khiller@kennethhiller.com>]
Sent: Tuesday, October 18, 2016 6:43 PM
To: 'paw@connorsllp.com' <paw@connorsllp.com>
Cc: 'tmc@connorsllp.com' <tmc@connorsllp.com>; sandrews@kennethhiller.com
Subject: Wagner v. Ilecki

Dear Mr. Woodard:

At the outset of this case, I questioned your firm's representation of the Ilecki law firm in this case due to your firm's representation of me in a claim made against my firm in the past. In that case, I divulged confidential information to your firm regarding my employees and the practices of my firm.

It has come to my attention that you are seeking to depose, without restriction, Seth Andrews, an attorney employed by my firm. I think very clearly at this point there is a conflict of interest. Confidential information I provided to your firm in the course of your firm's representation of me might be used to aid in your cross-examination of Mr. Andrews.

At this time, your firm is representing a client who has an interest materially adverse to the interests of my firm. I believe at this time there is no question that your firm must withdraw as counsel in this case. Please promptly confirm that you will be filing such a motion.

Kenneth Hiller
Law Offices of Kenneth Hiller PLLC
6000 North Bailey Avenue, Ste. 1A
Amherst, NY 14226
716-564-3288